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January 22, 2021

VIA ECF

The Honorable Hildy Bowbeer
United States Magistrate Judge
734 Federal Building
316 N. Robert Street
St. Paul, MN 55101

Re: *In Re Pork Antitrust Litigation*, No. 18-cv-1776 (JRT/HB)

Your Honor:

I represent Defendant JBS USA Food Company ("JBS USA") in the above-referenced matter and write to provide a joint status update on behalf of JBS USA and Plaintiffs regarding the parties' negotiations on document search methodology and search terms, as well as JBS USA's amended responses and objections to Plaintiffs' requests for production. [ECF Nos. 615 & 643.]

The parties are pleased to report that their meet-and-confer efforts relating to JBS USA's amended responses and objections to Plaintiffs' requests for production have been successful, such that the parties have reached agreement and no disputes remain regarding JBS USA's amended responses and objections.

With respect to document search methodology and search terms, Plaintiffs and JBS USA have had numerous productive discussions, but have not yet exhausted the meet-and-confer process. The parties have been working diligently toward reaching agreement and believe they may be able to resolve or narrow the current disputes if given more time to negotiate. The parties will continue to meet and confer and will provide an update on their progress, including whether any disputed issues remain, in their update letter to be filed in advance of the February 10, 2021 case management conference.

Respectfully submitted,

/s/ Sami Rashid

Sami Rashid

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